This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

MIM Date 2/15/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely,

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 032 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DRAFT

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Mound Near Radioactive Waste Management Complex (RWMC) Gravel Pit

Site ID:

032

Operable Unit:

10-08

Waste Area Group:

10

I. Summary – Physical Description of the Site:

Site 032 consists of one small depression and two mounds that appear to be from a backhoe excavation, located approximately 1.5 miles northwest of the Radiological Waste Management Complex (RWMC); between the RWMC gravel pit and the Big Lost River. This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are

The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

The site consists of a small depression with gravel mounds each side. The depression is similar in size to the combined size of the mounds, and both resemble numerous other mounds and pits across the INEEL. Interviews with INEEL Facility Operations and Cultural Resource personnel revealed that the pits and mounds likely resulted from geotechnical investigations (test excavations) for potential borrow pits (tested for depth to basalt, soil types, etc.).

There is no indication of stained or discolored soil, buried material, or visible debris near or surrounding the depression/mounds. Native grasses and sagebrush are fairly well established in the depression, however, the mounds have weedy and sparse vegetation, which is typical of other mounds found across the INEEL. This is likely due to the fact that the mounds are covered with soil from the "calcic" horizon, which has a lower nutrient content, and is not conducive to proper plant growth. There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. The description of the site condition is based on recent site investigations and historical research. No field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with INEEL Cultural Resource and Facility Operations personnel, and photographs revealed no evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 032 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility of contaminant levels at this site being above risk-based limits is remote. Field investigations and visual observations of the debris and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical research, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote area with no viable pathways or receptors. The site is located in the southwestern section of the INEEL approximately 1.5 miles northwest of RWMC between the RWMC gravel pit and the Big Lost River. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants. The depression and mounds are similar to numerous others located across the INEEL that served as geotechnical test pits for fill material to be used for road building or construction activities. Neither the depression nor the mounds appear to contain anything that would pose a risk to human health or the environment.

Signatures: Wenco Color		# Pages:	16	Date:	08/22/01
Prepared By: Marilyn Paarmann, WPI	DOE W	AG Manager	·:		(1200)
Approved By: Mill Holes 9-30-0	Indepen	dent Revie	N. Sarly	TC, Her	4

DECISION	STATEMENT
(DOI	E RPM)

Date Received: 1/14/65

Disposition:

5,te 032 near RWMC is classified as no action. This determination will be recorded in the 5, the database and listed in the 2005

INEEL Integrated 5-Year Review

Date: 1/14/05 # Pages: 1011

Name: 16014 keen Hain Signature: Hallen & Hain

			STATEMENT RPM)	site	032
Date Rec	eived:				
Dispositi	ion:				
	SPA	Concus	that	this	15 a
n	o actum	site.			
Date:	9-23-04	. ^	# Pages:	<u></u>	- 010
Name:	Dennis Fo	inlk	Signature:	0,	XV.

DECISION STATEMENT (IDEQ RPM)		
Date Received: May 8, 2002		
Disposition:		
Site 032		
Site 032 is a small depression and two mounds the RWMC near the RWMC Gravel Pit. The masize of the mounds and is similar to numerous of INEEL. Interviews indicate these pits and mound investigations. There is no evidence of stained near the pit or mounds. Previously, the EPA regeophysical techniques to ensure that only soil been done. The State concurs with DOE that sufficient inform No Further Action site	nound is similar in size to the combined other pits and mounds located across the ands are probably the result of geotechnical soils, buried materials, or visible debris equested disturbing the mound or using a re present. The additional work has not	
Date: A 15 11, 2004	# Pages:	
Name: Matyl F. Koch	Signature: Lang & Joh	

PROCESS/WASTE WORKSHEET	VORKSHEET	
SITE ID: 032	PROCESS:	Mound Near RWMC Gravel Pit
	WASTE:	Depression and Related Mounds
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
One small depression and two mounds related to INEEL activities.	Depression/mounds that appear to be from a backhoe or front end-loader excavation; likely geotechnical test pit conducted at the INEEL.	Artifact: Location: The site is located in the southwestern section of the INEEL; approximately 1.5 miles northwest of RWMC; between the RWMC gravel pit and the Big Lost River. Description: The site consists of a small depression with two mounds on each side. Anecdotal information suggests that the depression and mounds resulted from geotechnical investigations (test excavations) for potential borrow pits.

DRAFT

CONTAMINANT WORKSHEET					
SITE ID: 032	PROCESS:	Mound Near RWMC Gravel Pit	avel Pit		
	WASTE:	Depression and Related Mounds	d Mounds		
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/	Col 9 Overall Reliability (high/med/ low)
None	Soil	Non e	Not Applicable	Low	High

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?
Block 1	Answer:
each side of the approximately resulted from a depth to basal	sts of a small depression and two mounds that appear to have been pushed up on the depression using a backhoe or front end-loader. The depression and mounds are the same size and are similar to a multitude of others found across the INEEL that geotechnical investigations (test excavations) for potential borrow pits (tested for t, soil types, soil values, etc.). The site is located in the southwestern section of the kimately 1.5 miles northwest of RWMC; between the RWMC gravel pit and the Big
Block 2	How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)
Facility Opera	n INEEL Environmental Restoration Environment Safety and Health (ER ES&H), tions and Cultural Resource personnel revealed that the depression and mounds geotechnical investigations.
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No
	If so, describe the confirmation. (check one)
	d site investigations were conducted with ER ES&H personnel and WAG 10 and urce personnel. Photographs confirm the present condition of the site.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
_	2, 5,6 Documentation about Data Disposal Data Disposal Data DA Data DA Data DA Data DA Data DA Data DA DA DATA

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?
Block 1	Answer:
nature from go located in the	sts of a small gravel excavated depression and two mounds considered industrial in entechnical investigations (test excavations) for potential borrow pits. The site is southwestern section of the INEEL; approximately 1.5 miles northwest of RWMC; RWMC gravel pit and the Big Lost River.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
excavated de	O and Cultural Resource personnel confirmed that the site includes a small pression and two mounds related to INEEL geotechnical activities. Neither the property the mounds appear to contain anything that would pose a potential threat to human environment.
Block 3	Has this INFORMATION been confirmed? ☑ Yes ☐ No If so, describe the confirmation. (check one)
This informati photographs.	on was confirmed with interviews, site investigations, historical research and
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data Disposal Data Disposal Data Disposal Data Disposal Data DA DA Data DA DA DA DATA DA DA DA DATA DA DA DA DATA DA D

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.
Block 1	Answer:
constituents, of investigation of	ridence that a source exists at Site 032. There is no evidence of hazardous disturbed vegetation, stained or discolored soil, or odors. During a June 6, 2001 site conducted by INEEL WAG 10 and Cultural Resource personnel, there was no visible ained or discolored soil, buried material, or debris in or around the bunds.
Block 2	How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)
•	tions and interviews confirm that neither the depression nor the mounds pose a risk to or the environment.
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)
	d site investigations confirm that the site contains a gravel depression and mounds.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
No Available	
Anecdotal Historical Pro	
Current Proc Photographs	
Engineering/	Site Drawings D&D Report
Unusual Occ Summary Do	urrence Report
Facility SOPs Other	S Construction Data

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?
Block 1	Answer:
hazardous co investigation of gravel depres	vidence of migration at Site 032. Site investigations reveal no visual evidence of instituents, disturbed, stained or discolored soil areas, or odors. A June 6, 2001 site conducted by INEEL WAG 10 and Cultural Resource personnel determined that the sion and mounds indicated no visible evidence of stained or discolored soil, buried ebris in or around the depression/mounds.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
	spections and photographs of the site show no soil staining or discoloration present; ing no indication of presence of contaminants.
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)
assessment a	ion was confirmed through site inspections during a 1994 environmental baseline and INEEL WAG 10 and Cultural Resource investigation. Photographs taken of the site urrent condition of the site.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data ocess Data Disposal Data QA Data S Safety Analysis Report Surrence Report Initial Assessment Well Data

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?				
Block 1	Answer:				
substances or the area, or or cannot be esti					
Block 2	How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from an environmental baseline assessment conducted in 1994, and a subsequent site investigation conducted by INEEL WAG 10 and Cultural Resource personnel. Investigations reveal that the site contains a small gravel depression and mounds which are likely related to INEEL road construction or geotechnical research activities. Photographs of the site show no stained or discolored soil areas.					
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)				
This information was confirmed through INEEL WAG 10 and Cultural Resource site inspections, photographs, interviews and Cultural Resource historical research.					
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)				
	2, 5,6 Documentation about Data Disposal Data Disposal Data DA Data DA Data DA Data DA Data DA Data DA DA DATA				

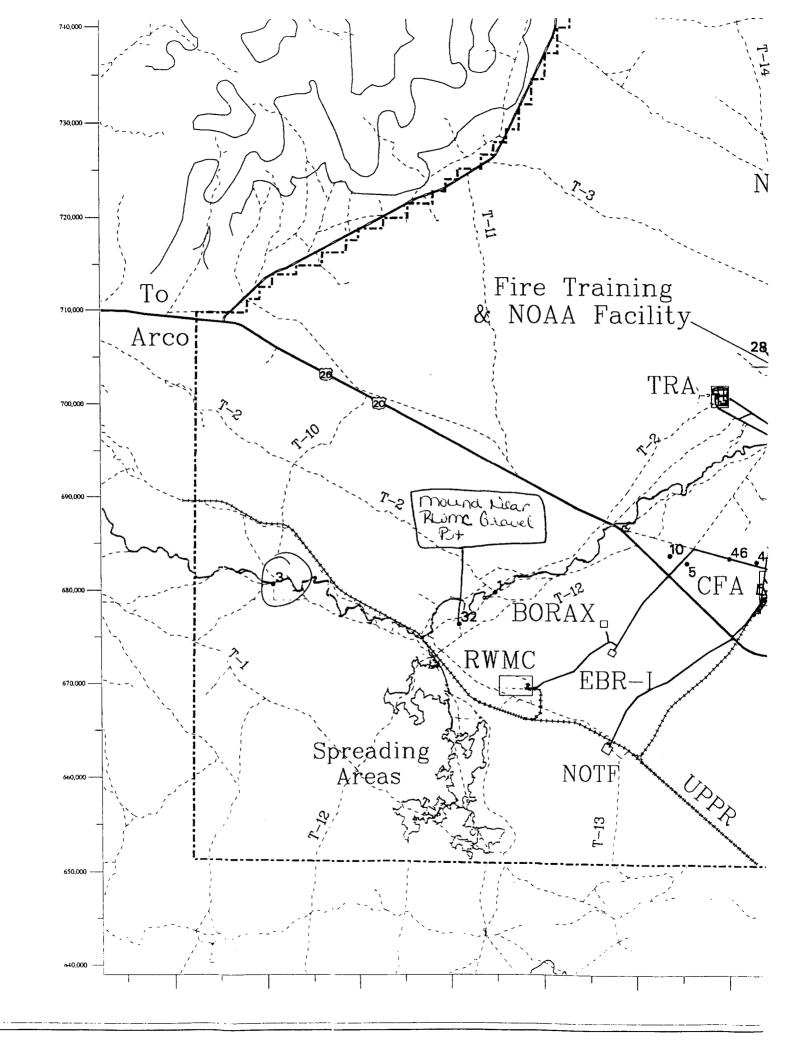
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.
Block 1	Answer:
area. The site side of the de	tions and photographs indicate that Site 032 covers an approximately 20 ft by 20 ft consists of a small gravel excavation depression and mounds pushed up on each pression. There is no evidence of a source at this site or contaminated region to use there is no evidence of hazardous or radioactive materials.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
investigation of indication that	on was obtained from a 1994 environmental baseline assessment, and a recent site conducted by INEEL WAG 10 and Cultural Resources personnel. Neither gave any the site contains anything that would cause a risk. Photographs of the area show no oil staining or discoloration.
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)
Interviews, sit	e investigations, photographs and historical research confirm this information.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2, 5,6 Documentation about Data ocess Data Disposal Data QA Data S Safety Analysis Report Site Drawings Currence Report Initial Assessment Well Data

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.				
Block 1	Answer:				
The estimated quantity of hazardous substance/constituents at this site is near zero, because there is no evidence of any hazardous or radioactive material present at Site 032. The site contains a small gravel depression and two mounds likely resulting from geotechnical investigations. There is no visible evidence of stained or discolored soil, buried material, or debris in or around the depression/mounds.					
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from an environmental baseline assessment, INEEL WAG 10 and Cultural Resource investigations, interviews and photographs. There is no indication that the gravel depression or mounds contain anything that would cause potential contamination.					
Block 3	Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, interviews, photographs and historical research.					
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)					
	2, 5,6 Documentation about Data Disposal Data Cess Data CA Data S Safety Analysis Report CSite Drawings Currence Report D&D Report Initial Assessment Well Data				

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.				
Block 1	Answer:				
There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. INEEL WAG 10 and Cultural Resource personnel confirm that the site contains a small excavated depression and mounds likely resulting from INEEL geotechnical investigation. There is no visible evidence of a road leading to the mounds, nor indication of stained or discolored soil, buried material, odors, or debris.					
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)				
This evaluation is based on interviews, site visitations and photographs of the area. The site shows no soil staining and the vegetation appears to be moderately established, with the exception of the mounds, which would be expected based on excavated soil and lack of soil nutrients.					
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, cultural resource historical research, interviews, and photographs.					
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)					
	2, 5,6 Documentation about Data Disposal Data Disposal Data DA Data Site Drawings DAD Report DISPOSAL DATA DATA DATA DATA DATA DATA DATA DATA				

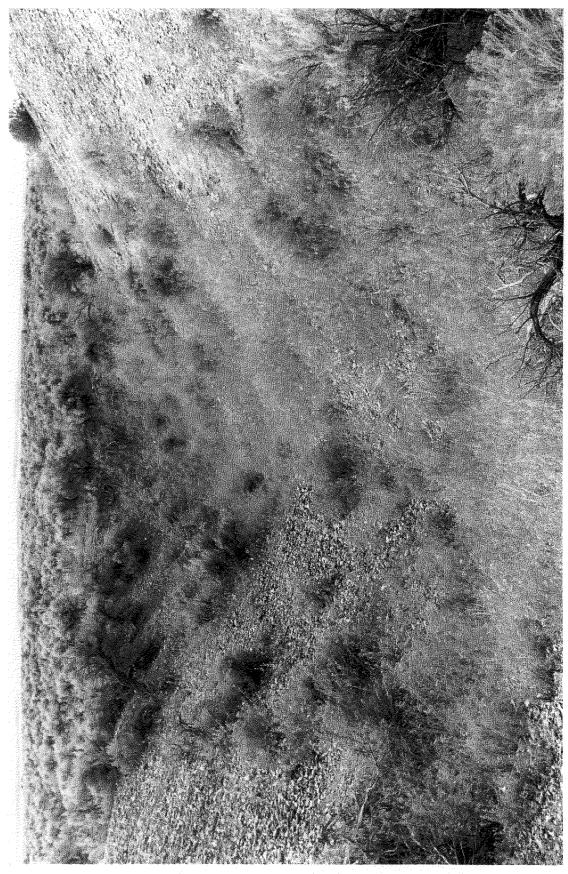
REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6-7, 2001.
- 3. Photographs of Site 032: PN99-0424-1-11, -12, -13.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.
- 6. Site investigation conducted by Tom Haney, INEEL Wage 10 and Brenda Ringe, INEEL Cultural Resources Management, June 6, 2001.

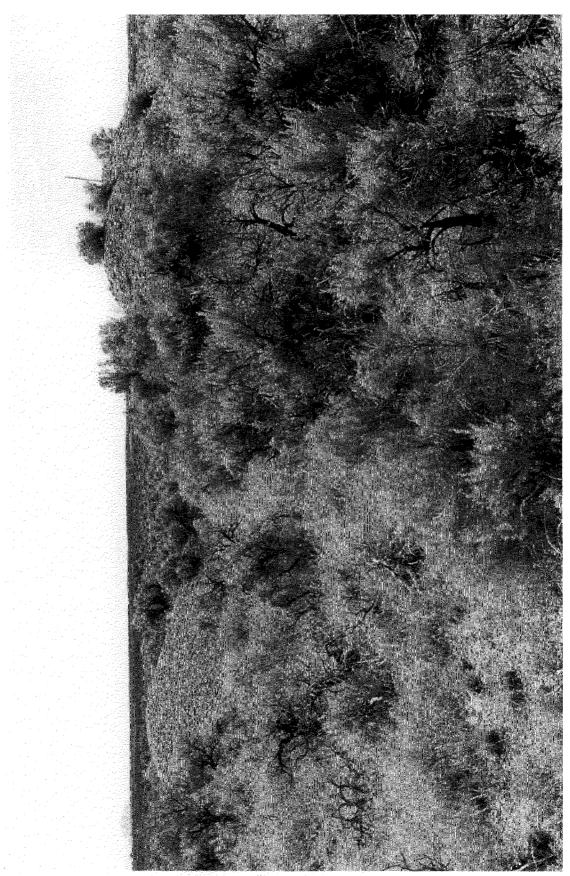


Attachment A

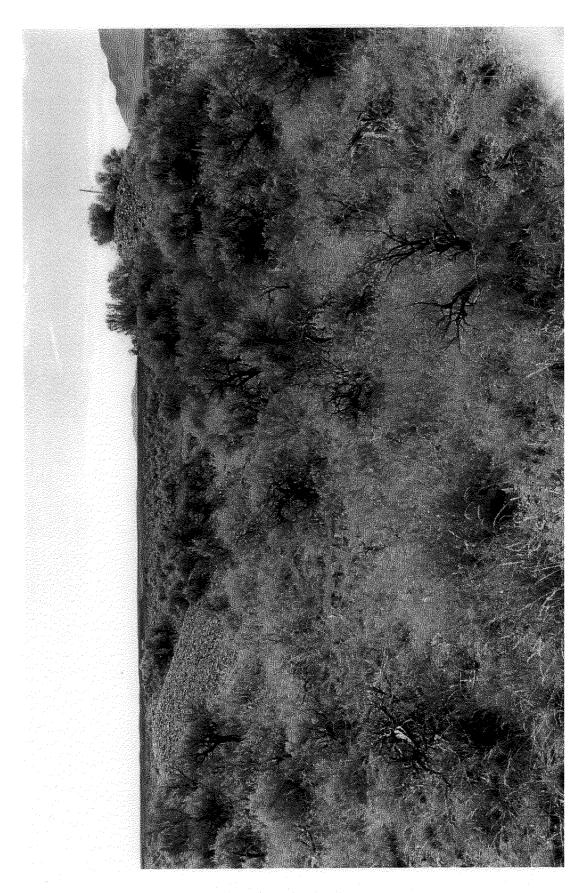
Photographs of Site #032



Site: 032 Mound Near RWMC Gravel Pit PN99-0424-1-11



Site: 032 Mound Near RWMC Gravel Pit PN99-0424-1-12



Site: 032 Mound Near RWMC Gravel Pit PN99-0424-1-13

Attachment B

Supporting Information for Site #032

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer						
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877				
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324				
2.	Site Title: 032, Mound Near RWMC Gravel Pit					
3.	Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site. A mound is located between the RWMC gravel pit and the Big Lost River. During the July 1999 site visit, a depression/mound that appears to be from a backhoe excavation was observed. The GPS coordinates of the site are					
	reference number for this site is 032 and can be found on the summary map as	provided.				
Par	t B – To Be Completed By Contractor WAG Manager					
4.	Recommendation:					
	This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO. WAG: Operable Unit:					
	This site DOES NOT meet the requirements for an inactive waste site, DOE included in the INEEL FFA/CO Action Plan.	ES NOT require investigation and SHOULD NOT be				
5.	Basis for the recommendation:					
	The conditions that exist at this site indicate the potential for an inactive waste site according to Section 2 of MCP-3448 Reporting or Disturbance of Suspected Inactive Waste Sites.					
	The basis for recommendation must include: (1) source description; (2) exposure concern; and (4) descriptions of interfaces with other programs, as applicable (exposure concern) and (4) descriptions of interfaces with other programs, as applicable (exposure concern).	ure pathways; (3) potential contaminants of e.g., D&D, Facility Operations, etc.)				
6.	Contractor WAG Manager Certification: I have examined the proposed site and believe the information to be true, accurate, and complete. My recommendation	the information submitted in this document and his indicated in Section 4 above.				
Nar	ne: Signature:	Date:				



PROJECT DOCUMENT REVIEW RECORD

lound near RWMC Gravel Pit (DOE/ID		KESOLUTION.		Comment incorporated. We have deleted the sentence that incorrectly stated the gravel was used.
Site 032 Track 1 Decision Documentation Package, OU 10-08: Mound near RWMC Gravel Pit (DOE/ID 10946)	REVIEWER: IDEO	COMMENT		The description indicates the pit and mound resulted from a geotechnical investigation. Therefore, the volumes of the two features should be nearly the same, ignoring expansion of the waste soil removed from the pit. The last sentence however refutes this assessment by stating that "The gravel may have been used as fill material for road building" If indeed gravel was removed from the pit, the volumes will not be the same unless something was buried in the pit. Please clarify if gravel or other materials were removed from the pit or if this is intended as a clarifying statement to the intent of the geotechnical investigation. The same issue arises on pages 8 and 9.
CRIPTION:	REV	PAGE NUMBER		Page 6, column 3
DOCUMENT TITLE/DESCRIPTION:	DATE: April 2, 2002	SECTION NUMBER	TS	
DOCUME	DATE: A	ITEM NUMBER	COMMENTS	-